



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

FEB 20 2018

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This is in reference to your correspondence, with enclosed samples, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB). In your letter, you asked for a classification of a Glock-type "PF940V2 Blank" on behalf of your client, Polymer 80 Incorporated (see enclosed photos). Specifically, you wish to know if this item would be classified as a "firearm" under the Gun Control Act of 1968 (GCA). You state that, "we believe the enclosed item is not a firearm",

For your reference in this matter, the amended Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(3), defines the term "**firearm**" to include any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive...[and]...*the frame or receiver of any such weapon*...

Also, 27 CFR § 478.11 defines "**firearm frame or receiver**". *That part of a firearm which provides housing for the hammer, bolt or breechblock, and firing mechanism, and which is usually threaded at its forward portion to receive the barrel.*

Also, the GCA, 18 U.S.C. § 921(a)(29), defines "**handgun**" to include "a firearm which has a short stock and is designed to be held and fired by the use of a single hand; and (B) any combination of parts from which a firearm described in subparagraph (A) can be assembled.

In addition, 27 CFR § 478.11 defines a "**pistol**" to mean "a weapon originally designed, made and intended to fire a projectile (bullet) from one or more barrels when held in one

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hand, and having (a) a chamber(s) as integral part(s) of, or permanently aligned with, the bore(s); and (b) a short stock designed to be gripped by one hand at an angle to and extending below the line of the bore(s)."

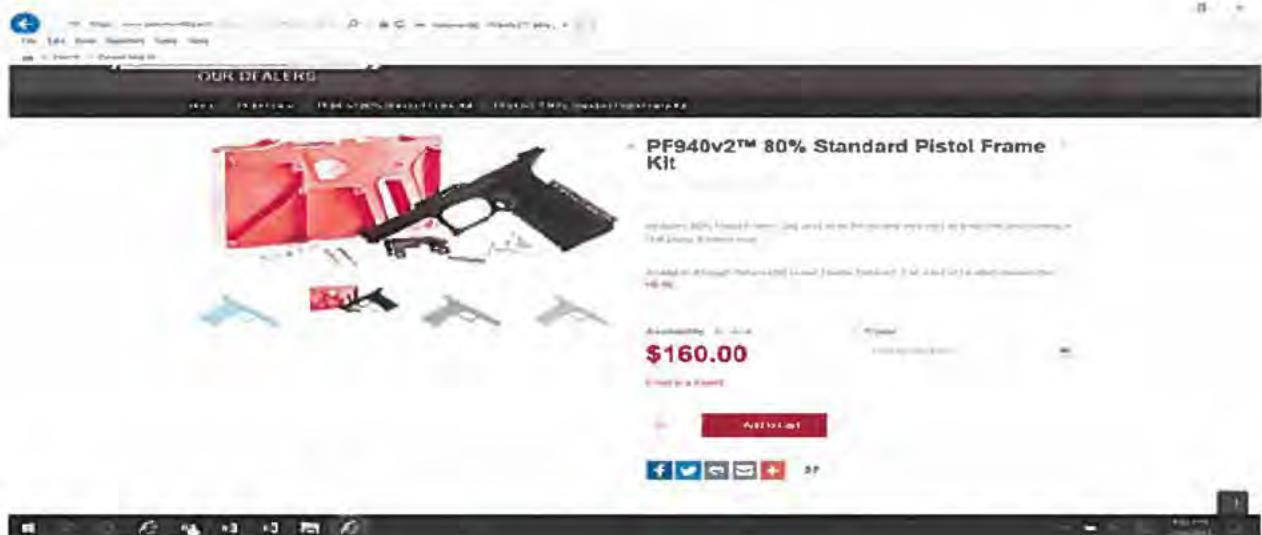
During the examination of your sample "PF940V2", FTISB personnel found that the following machining operations or design features present or completed:

1. Trigger slot.
2. Capable of accepting Glock 17 trigger mechanism housing.
3. Capable of accepting Glock 17 trigger bar.
4. Magazine well.
5. Magazine catch.
6. Accessory rail.
7. Slide-stop lever recess.
8. Magazine catch spring recess.
9. Metal embedded plate in dust cover.

Machining operations or design features not yet present or completed:

1. Trigger-pin hole machined or indexed.
2. Trigger mechanism housing pin machined or indexed.
3. Locking block-pin hole machined or indexed.
4. Devoid of front or rear frame rails.
5. Barrel seat machined or formed.
6. Incapable of accepting Glock locking-block.

It is clear from the above information provided in your correspondence that the submitted sample is only a component used in the assembly of an end-item. Research conducted by FTISB has disclosed that a Polymer 80 Model PF940V2 is being marketed at www.polymer80.com, as depicted in screenshots below:



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Image of Polymer 80 Model PF940V2 80% Standard Pistol Frame Kit obtained from www.polymer80.com

FTISB also noted the following markings on the submitted sample:

- **PF40V2**
- **MADE IN USA**
- **POLYMER80, INC.**
- **DAYTON, NV**
- **P80**

The following is a description from Polymer 80's website that describes the item and what is included with the purchase of the Polymer 80 Model PF940V2 80% Standard Pistol Frame Kit:

- **The PF940v2™ is compatible with components for 3-pin 9mm G17, 34, 17L; .40S&W G22, 35, 24; and .357Sig G31.**
- **Next Generation Ergonomics and Features**
- **High-Strength Reinforced Polymer Construction**
- **The ReadyMod® frame features a blank grip design that is ready for stippling and other grip customization.**
- **Picatinny/STANAG Compliant Accessory Rail**
- **Blank Serialization Plate**
- **Stainless Steel Locking Block Rail System (LBRST™)**
- **Stainless Steel Drop-In Rear Rail Module (RRM™)**
- **Hardened Pins for LBRST™ and RRM™**
- **Complete Finishing Jig, Drill bits and End Mill Included**

Clearly the submitted sample is simply a component of a larger product. In your correspondence, you reference that "the PF940V2 is missing critical operations necessary to complete the product".

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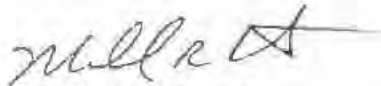
Please note, the *frame* or *receiver* of a firearm is a *firearm* as defined in GCA, 18 U.S.C. § 921(a)(3)(B), and any combination of parts from which a *handgun*, as defined in 18 U.S.C. § 921(a)(29), can be assembled is also a *firearm* as defined in 18 U.S.C. § 921(a)(3).

FTISB will not render a classification on a partial product submission. In order to receive an evaluation and classification of your product, please submit the complete Polymer 80 Model PF940V2 80% Standard Pistol Frame Kit being marketed by your client.

We caution that these findings are based on the sample as submitted. If the design, dimensions, configuration, method of operation, or materials used were changed, our determination would be subject to review. The submitted sample will be returned to you under a separate cover utilizing FEDEX account number (b) (6)

We thank you for your inquiry and trust the foregoing has been responsive to your evaluation request.

Sincerely yours,



Michael R. Curtis

Chief, Firearms Technology Industry Services Branch

Enclosure

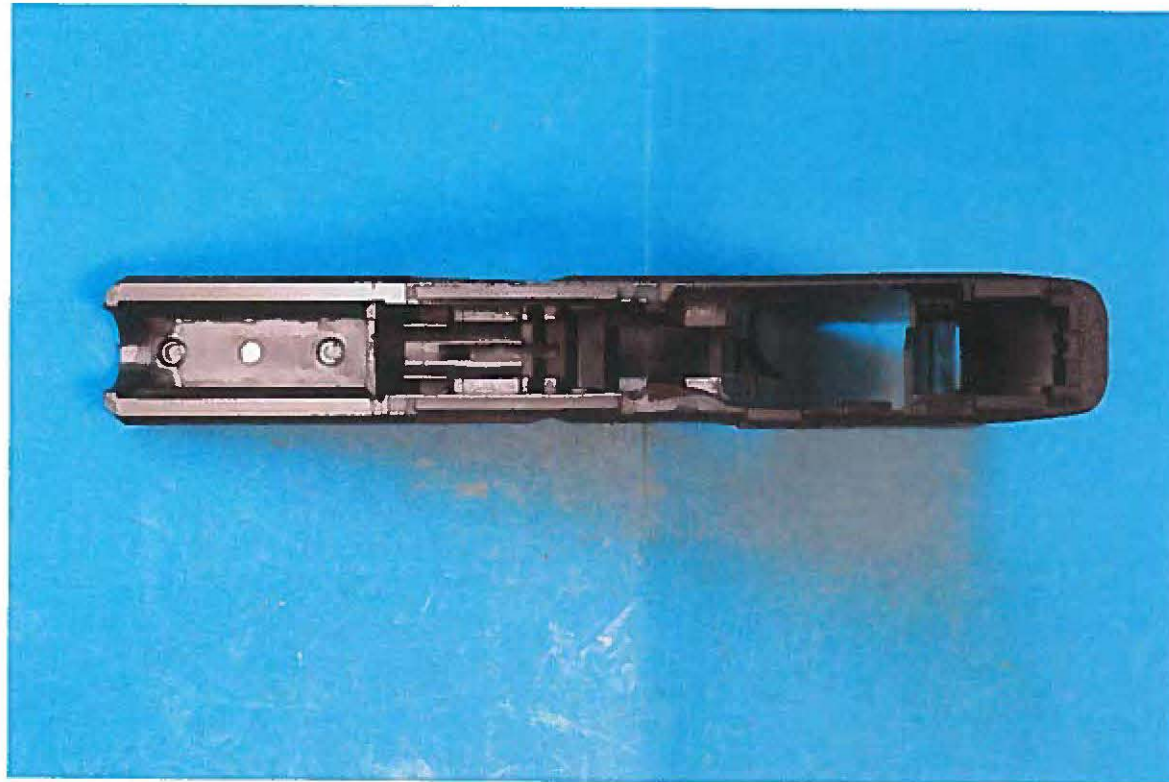
Polymer 80 PF940V2



Polymer 80 PF940V2



Polymer 80 PF940V2



Polymer 80 PF940V2

